

Exhibit C

RANDOLPH W. MARSHALL, PE

November 22, 2010

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IN THE UNITED STATES DISTRICT
COURT FOR THE MIDDLE DISTRICT
OF PENNSYLVANIA

METSO PAPER USA, INC.)
) 3:CV-08-47
- vs-)
)
GENERAL ELECTRIC COMPANY)
)

Videotaped deposition of RANDOLPH W.
MARSHALL, PE, held at 690 Lee Road, Suite 300,
Wayne, Pennsylvania, on Monday, November 22,
2010, at 9:37 a.m., before Dolores M. Horne,
Professional Reporter and Notary Public, in and
for the Commonwealth of Pennsylvania

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RANDOLPH W. MARSHALL, PE

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1 light fixture, then date code and replacement
2 lamp carton. That's the description of photos
3 that you took at the scene; is that correct?

4 A. A general description of them, yes,
5 yes.

6 Q. Then it says lights run 24/5. What
7 does that mean?

8 A. That's information I believe I
9 obtained from Mr. Kuzmick, is his name, his
10 card is on the fly leaf.

11 Q. Okay. I see on the front of this
12 folder where you have your file there's a Metso
13 Paper business card and it says David Kuzmick.
14 Is that the person you spoke to?

15 A. I believe so, yes.

16 Q. He's listed as shop supervisor, plant
17 maintenance, environmental management on his
18 business card. Does that sound correct?

19 A. Yes, that sounds correct.

20 Q. Did he tell you that their lamp lights
21 ran 24/5?

22 A. Yes. This would have been my notes of
23 a conversation with him.

24 Q. Okay. He said they were turned off



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1 Friday at 11:00, meaning 11:00 p.m.; is that
2 true?

3 A. That's my recollection, yes. I'm
4 pretty sure because they worked 24/5. They
5 turn them off on Friday night and start them up
6 again on Monday morning.

7 Q. It says then on Sat at 7:00 a.m. What
8 does that mean?

9 A. Sometimes they would work on
10 Saturdays. They would turn them on at 7
11 o'clock and work for however long they're
12 working on Saturdays.

13 Q. Okay. Did he say -- any indication of
14 what percentage of Saturdays they come in and
15 work?

16 A. He could not give me that information.
17 On occasion is basically the idea that he came
18 across. I don't know if that's his words but
19 that's the idea I got.

20 Q. But he was unable to quantify it in
21 terms of is it every other Saturday or one out
22 of ten or one out of five?

23 A. He was not able to quantify it for me.

24 Q. Okay. This says loss at



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